



LEWIS BRISBOIS BISGAARD & SMITH LLP

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August 30, 2021

File No.  
50031.2179

**VIA ECF**

Hon. Victor Marrero  
United States District Court  
Southern District of New York  
500 Pearl Street, Suite 1610  
New York, NY 10007-1312

Re: *Rosenfield & Company, PLLC v. Trachtenberg, Rodes & Friedberg LLP et al.*  
1:21-cv-03858-VM

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Dear Judge Marrero:

We are counsel to third-party defendants Barry Friedberg and Leonard Rodes, as well as counsel to defendant Trachtenberg Rodes & Friedberg LLP. We write to address two issues on the docket in need of clarification.

First, on August 23, 2021, we wrote to Your Honor on behalf of third-party defendants Barry Friedberg and Leonard Rodes requesting a 45 day extension, up to and including October 7, 2021, of the deadline for the third-party defendants to answer, move, or otherwise respond to the third-party complaint of third-party plaintiffs Star Auto Sales of Bayside, Inc., Star Auto Sales of Queens, LLC, Star Hyundai LLC, Star Nissan, metro Chrysler Plymouth Inc., Star Auto Sales of Queens County LLC, and Star Auto Sales of Queens Village LLC (collectively “Star Defendants”) (Dkt. No. 58).

The August 23, 2021 letter also contained a request made on behalf of defendant Trachtenberg Rodes and Friedberg LLP for the same extension of its deadline to answer, move, or otherwise respond to the crossclaims of the Star Defendants. Both requests were made with the consent of the Star Defendants.

On August 26, 2021, Your Honor granted the requested extension (Dkt. No. 60). However, the Court inadvertently omitted reference to the third-party defendants Barry Friedberg and Leonard Rodes. We respectfully request this Court approve the requested 45 day extension of the deadline for the third-party defendants to answer, move, or otherwise respond to the third-party complaint of the Star Defendants.

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Second, on August 18, 2021, this office filed a notice of appearance on behalf of third-party defendants Barry Friedberg and Leonard Rodes (Dkt. No. 54). The Court inadvertently recorded our representation of Mr. Rodes only and omitted reference to Mr. Friedberg. We request the Court record this office as appearing as counsel of record for both third-party defendants Barry Friedberg and Leonard Rodes.

We thank the Court for its attention to this matter.

Respectfully,

/s/ *Mark Anesh*

Mark K. Anesh of  
LEWIS BRISBOIS BISGAARD &  
SMITH LLP

MKA/aww

cc: All parties by ECF

**Request GRANTED.**

The response of third-party defendants Barry Friedberg and Leonard Rodes to the Star Defendants' third-party complaint is hereby due no later than October 7, 2021. Counsel for Barry Friedberg must file a notice of appearance in order to be recorded as appearing as counsel of record for Mr. Friedberg. No Court action is necessary.

**SO ORDERED.**

August 31, 2021

DATE



VICTOR MARRERO, U.S.D.J.